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9	I AW OFFICER OF IORINIA EDIEDMANI DO							
10	LAW OFFICES OF JOSHUA FRIEDMAN, P.C.							
11	Rebecca Houlding, Esq.							
12	1050 Seven Oaks Lane							
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17	Admitted Pro Hac Vice							
18								
19								
20								
21	UNITED STATES	DIST	RICT COURT					
22	DISTRICT OF NEVADA							
23								
24	ANTONIO CLEMENT,	}						
25	,	,						
26	Plaintiff,	}	Civil Case No. 2:13 CV 685					
27	. ,	,	(MMD) (CWH)					
28		}						
29		,						
30	VALLEY HEALTH SYSTEM, LLC	}						
31	D/B/A SPRING VALLEY HOSPITAL MEDICAL	S						
32								
	CENTER,							
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34	MOTION FOR LEAVE	TA CI	TABLE DI AINTERIC					
35	MOTION FOR LEAVE							
36	EARLY NEUTRAL EVALUATION	51A	IEMENI WIIH DEFENDANI					
37								
20	NOW COMES Plaintiff Antonia Clament	hy on	d through goungal, and haraby mayor this					
38	NOW COMES Plaintiff Antonio Clement,	by an	d through counsel, and hereby moves this					
39	Honorable Court for leave to share Plaintiff's Early	Neuti	ral Evaluation Statement ("ENE Statement")					
	Tionorable Court for leave to share Flament's Early	rveuu	tai Evaluation Statement (EIVE Statement)					
40	with Defendant in advance of the Early Neutral Ev	aluati	on session in this case, set for September 17,					
41	2013. Joshua Friedman, Esq. of the Law Offices o	f Josh	ua Friedman will be in attendance at the					
42	session with Mr. Clement.							
42								
43	Judge Ferenbach's ENE Order, Docket Entr	y 13, j	prohibits the parties from sharing their ENE					

1	Statements.					
2	Plaintiff believes that sharing in advance much of Plaintiff's views concerning the facts, the					
3	legal analysis of Plaintiff's claims, and potential verdicts if the case is not resolved, will make the					
4	mediation session more productive. Defendant will have a better picture of Plaintiff's position, which					
5	will make the ENE session more efficient.					
6	Plaintiff's counsel regularly shares mediation statements with opposing counsel wherever					
7	possible, and believes that it is useful.					
8	WHEREFORE, the Plaintiff requests that the Court grant Plaintiff leave to share his ENE					
9	Statement with counsel for Defendant. Plaintiff does not request or require that Defendant share its					
10	ENE Statement with Plaintiff, although Plaintiff does not oppose receiving it.					
11 12 13	Dated: September 10, 2013 Mamaroneck, NY					
14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35	By: _/s/ Rebecca Houlding Rebecca Houlding, Esq. Law Offices of Joshua Friedman, P.C. 1050 Seven Oaks Lane Mamaroneck, NY 10543 888-369-1119 x5 Fax: 866-731-5553 rebecca@joshuafriedmanesq.com Admitted Pro Hac Vice					
36 37	Local Counsel for Plaintiffs					

CERTIFICATE OF SERVICE

I, Rebecca Houlding, hereby certify that today, September 10, 2013, I served a copy of the foregoing Motion for Leave to Share Plaintiff's Early Neutral Evaluation Statement with Defendant, upon all designated recipients on the service list by filing on ECF.

By: /s/ Rebecca Houlding
Rebecca Houlding

1 2 3 4 5 6 7 8 9 10 11 11 12 13 14	LAW OFFICES OF ROBERT SPRETNAK Robert Spretnak, Esq. (Bar No. 5135) 8275 S. Eastern Avenue, Suite 200 Las Vegas, NV 89123 Telephone: 702.454.4900 Fax: 702.938.1055 Email: bob@spretnak.com Local Counsel for Plaintiffs LAW OFFICES OF JOSHUA FRIEDMAN, P.C. Rebecca Houlding, Esq. 1050 Seven Oaks Lane Mamaroneck, NY 10543 Telephone: 212.308.4338 Fax: 866.731.5553						
16 17	Email: rebecca@joshuafriedmanesq.com Admitted Pro Hac Vice						
18	Admitted F10 flac vice						
19 20							
21	UNITED STATES						
22 23	DISTRICT	OF N	NEVADA 				
24 25	ANTONIO CLEMENT,	}					
26	Plaintiff,	}	Civil Case No. 2:13 CV 685				
27 28		}	(MMD) (CWH)				
29 30	VALLEY HEALTH SYSTEM, LLC	}					
31 32	D/B/A SPRING VALLEY HOSPITAL MEDICAL CENTER,	,					
33	,						
34 35 36	PROPOSED ORDER GRANTING MOTION FOR LEAVE TO SHARE PLAINTIFF'S EARLY NEUTRAL EVALUATION STATEMENT						
37 38 WHEREAS, upon consideration of the Plaintiffs' motion for leave to share Plaintiff's EN							
39	Statement with Defendant in advance of the September 17, 2013 ENE, this Court finds that Plaintiff						
40	may share his ENE Statement.						
41							
42							
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Case 2:13-cv-00685-RFB-CWH Document 21 Filed 09/11/13 Page 5 of 5

1	THEREFORE, IT IS HEREBY ORDERED that Plaintiff may share his ENE Statement with Defendant may also share its ENE statement with Plaintiff, but
2	Defendant. Defendant is not required to do so.
3	DATED this 11th day of September, 2013.
4	BY THE COURT:
5	Contacto
6 7	— U.S.D.J.
	United States Magistrate Judge